

United States District Court
District of Massachusetts

PAMELA JAMISON,
Plaintiff,

v.

CITY OF SPRINGFIELD,
MAYOR, DOMENIC SARNO
POLICE COMMISSIONER WILLIAM
J. FITCHET
DEPUTY CHIEF JOHN BARBIERI,
et al
Defendants,

CIVIL ACTION NO.:
3:14-cv-30161

**JOINT PROPOSED STATEMENT REGARDING
NEW SCHEDULING ORDER**

Now come the Parties, and request an order for discovery and a proposed schedule. The Parties request that the filing of motions and pre-trial scheduling as follows:

1. All automatic discovery will be exchanged by August 21, 2015, which is 17 days from the scheduling conference that is set for August 4, 2015, pursuant to Fed.R.Civ.P. 26(a)(1)(c).
2. All written discovery requests will be served by October 3, 2015, which is 60 days from the scheduling conference.
3. All motions to amend pleadings to add parties, complying with Local Rule 15.1(B) , (which requires seeking an amendment that

would add a new party to serve the motion to amend on the proposed party at least 10 days prior to filing), be served by November 2, 2016, which is 90 days from the scheduling conference.

4. All non-expert discovery and depositions will be completed by February 1, 2016, which is 180 days from the scheduling conference.
5. Plaintiffs shall designate and disclose information regarding their trial experts as required by Fed. R. Civ. P. 26 (a)(2) by March 1, 2016, which is 210 240 days from the scheduling conference.
6. Defendants shall designate and disclose information regarding their trial experts as required by Fed. R. Civ. P. 26 (a)(2) by April 1, 2016, which is 240 days from the scheduling conference.
7. All expert depositions shall be completed by June 30, 2016, which is 330 days from the scheduling conference.
8. Defendants shall file their Summary Judgment motions, if any, by August 4, 2016, which is 365 days from the scheduling conference.
9. Plaintiffs' Opposition to Defendants' Motion for Summary Judgment shall be filed by September 6, 2016, which is 400 days from the scheduling conference to which Defendants' may reply by September 20, 2016.

Counsel will appear again before this court for a status conference thereafter.

Respectfully submitted,

**THE PLAINTIFF,
PAMELA JAMISON**

By her attorney

/s/ Raylene Wentz Sandoval

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**THE DEFENDANTS,
Justin Walter and
Eric Blair**

/s/ Kevin B. Coyle

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**THE DEFENDANT,
Eric Blair
By his attorney**

/s/ John T. Liebel

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true copy of the within Document was this day served upon Plaintiff and all counsel via the Federal Court's ECF Notice and delivery System to all parties.

SIGNED under the pains and penalties of perjury.

Dated: August 4, 2015

/s/ John T. Liebel

John T. Liebel, Esq.